

# **EXHIBIT 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

KRISTOPHER I. LAPKO, ALAN P.  
TUCSOK, and BECKY FORBUSH,  
individually, and as Representatives of a  
Class of Participants and Beneficiaries of  
the United Wholesale Mortgage Plan, LLC  
Profit Sharing Plan and Trust,

Plaintiffs,

v.

UNITED WHOLESALE MORTGAGE,  
LLC, BOARD OF DIRECTORS OF  
UNITED WHOLESALE MORTGAGE,  
LLC, and UNITED WHOLESALE  
MORTGAGE, LLC 401(K) COMMITTEE,

Defendants.

Case No. 2:25-cv-11216

Hon. Susan K. DeClercq  
United States District Judge

Hon. Curtis Ivy Jr.  
United States Magistrate Judge

**DECLARATION OF DEANA MATHEWS IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' COMPLAINT**

I, Deana Mathews, declare under 28 U.S.C. § 1746:

1. I am more than 18 years of age, am of sound mind, and am otherwise competent to give this declaration.
2. I am employed by United Wholesale Mortgage, LLC ("UWM") and am the Assistant Vice President Benefits and Human Resource Benefits Specialist.
3. I submit this declaration in support of Defendants' Motion to Dismiss Plaintiffs' Complaint.

4. I sign the Form 5500s for the United Wholesale Mortgage LLC Profit Sharing Plan and Trust (“Plan”) that are filed with the United States Department of Labor. I have personal knowledge of the matters discussed below.

5. Attached as Exhibit A is a copy of portions of the plan document for the United Wholesale Mortgage LLC Profit Sharing Plan and Trust, dated October 11, 2023.

6. Attached as Exhibit B is a copy of portions of the Plan’s Form 5500 for 2021 filed with the United States Department of Labor.

Executed on June 17, 2025.

  
Deana Mathews